

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CRAIG CUNNINGHAM on behalf of himself and all
others similarly situated,

Plaintiff,

Civil Action No. 2:17 cv 2080

-VS.-

SHORE FUNDING SOLUTIONS INC.,

Defendant.

**PLAINTIFF'S MOTION FOR CLASS CERTIFICATION AND FOR A
TEMPROARY STAY OF FURTHER PROCEEDINGS ON THAT MOTION**

Upon the accompanying Memorandum of Law, any further papers or argument to be submitted by Plaintiff at a subsequent date, and upon all prior pleadings, Plaintiff CRAIG CUNNINGHAM, by and through his undersigned counsel, hereby moves this Court for an order:

A. Taking this Motion under submission and deferring further activity on it until after the discovery cutoff date to be set in the Court's upcoming Rule 23 scheduling order, or alternatively;

B. Granting Plaintiff's motion for class certification pursuant to Fed. R. Civ. P. 23.

Dated: White Plains, New York
April 7, 2017

Respectfully submitted,

s/Aytan Y. Bellin
Aytan Y. Bellin

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Attorneys for Plaintiff and proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record and a copy will be served on Defendant(s) along with the summons and complaint.

s/Aytan Y. Bellin